



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
EMERGENCY RESPONSE BRANCH  
2525 N. SHADELAND AVENUE, SUITE 100  
INDIANAPOLIS, IN 46219

REPLY TO ATTENTION OF:  
SE-G1

November 22, 2013

Mr. Bradley Adams  
SESCO Group  
1426 West 29th Street  
Indianapolis, IN 46208

**TRANSMITTED ELECTRONICALLY**

Re: EPA Comments on Revised Work Plan  
Kokomo Dump Site (C564)  
1130 South Dixon Road  
Kokomo, Indiana  
Docket No. V-W-13 C-018

Dear Mr. Adams:

The U.S. Environmental Protection Agency completed its review of the revised Work Plan, dated October 25, 2013, for the Kokomo Dump Site. SESO Group (SESCO) submitted a Site Health and Safety Plan (HASP) and Quality Assurance Project Plan (QAPP) as attachments to the Work Plan. SESO submitted these documents on behalf of the City of Kokomo to comply with the Administrative Settlement Agreement and Order on Consent (ASAO) between EPA and the City of Kokomo.

EPA requires modifications to the Work Plan in the attached pages. HASP.

EPA rejects the QAPP. The AOC requires that QAPPs are developed using the Uniform Federal Policy for Quality Assurance Projects Plans (UFP-QAPP). The UFP-QAPP format was not followed. EPA modified the QAPP and provides you with the revised document to be incorporated into the Work Plan.

The final Work Plan must be submitted by 5 p.m. Eastern time within seven business days of receipt of this letter, or October 7, 2013, as specified in Section VIII, 17b of the ASAO.

The enclosed comments must be addressed. If the comments are not addressed, EPA will modify the document and provide the revised document to you for implementation.

If you believe that any changes are necessary other than those directed by EPA's enclosed comments, those changes must be discussed with, and approved by, EPA's On-Scene Coordinator (OSC) prior to re-submittal of the document. Those discussions may be memorialized in a progress report or other communication with EPA's OSC. In addition, all changes made to the document, other than those specifically at the direction of EPA, must be specified in writing to EPA upon re-submittal of the document.

If you have any questions concerning this matter, or would like to discuss the attached comments in detail, please contact me at 317-417-0980.

Sincerely,

Shelly Lam, LPG  
Federal On-Scene Coordinator

cc: William Pickard, SESCO Group  
Brent Graves, SESCO Group  
David Guevara, Taft Stettinius & Hollister, LLP  
Lawrence McCormack, City of Kokomo  
Maria Gonzalez, EPA Region 5  
James Ursic, EPA Region 5  
Ida Levin, EPA Region 5  
Duane Newell, EPA ERT  
Stacey DeLaReintrie, OTIE  
File

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## **Work Plan Modifications**

**Commented [GU1]:** Add contingency for hex chrome if chrome is above certain number.  
Add comments on schedule

### **1. Section 1.1, Introduction**

Modify the last bullet of the third paragraph as such, "Development of a Summary Report detailing the work performed and recommendations for additional work."

### **2. Section 2.7, Emergency Contingency Plan**

Add the Kokomo Police Department and Indiana Department of Environmental Management (IDEM) Emergency Response Section to the distribution list for emergency contingency plans.

### **3. Section 3.3.1, Site Boundary Survey Procedures**

In the second paragraph under Final Plan, change "it's" to "its."

### **4. Section 3.3.6, Surface and Subsurface Soil (Soil Boring Procedures)**

- a. Add that both surface and subsurface soil samples will be field screened with a photo-ionization detector (PID) or flame-ionization detector (FID) and x-ray fluorescence (XRF) detector.
- b. In addition to the 16 proposed soil borings, place soil borings near KD-SS-08, KD-SS-13, KD-SS-14, and KD-SS-23.
- c. For subsurface soil samples, a minimum of two samples will be collected from each boring as indicated by the highest field screening responses, at the base of the fill, or at the bottom of each boring.
- d. Revise the Subsurface Sampling analyses to collect samples for all proposed analytes at all subsurface soil sample locations.
- e. Table 9 must be revised to incorporate the comments in 4b, 4c, and 4d.

### **5. Section 3.3.7, Test Pit Excavation Procedures**

Add the following to the end of this section:

"A minimum of one (1) sample will be collected along each wall and the floor of each excavation. Sampled materials will be field screened with both PID and XRF. Samples will be submitted for laboratory analysis of RCRA metals, SVOCs, PCBs, 2,3,7,8-TCDD, and VOCs, if indicated by field screening results.

Excavated materials will be placed on heavy plastic sheeting. Heavy plastic sheeting will be used to cover excavation stockpiles overnight, during high wind, or during rain. The sheeting will be secured in place with sandbags or boulders. Surface water runoff resulting from rain will be diverted around covered stockpiles.

Excavations will be backfilled with the removed soil material. If drums or metal debris are encountered in excavations, those materials will be removed prior to backfilling. Excavated drums and metal debris will be relocated to the drum staging area."

### **6. Section 4.1, Cleanup Criteria**

Modify the second sentence of the first paragraph to reflect that Industrial Direct Contact Screening Levels (IDCSL) may be used as on-site cleanup objectives. Off-site cleanup objectives must meet residential standards.

**7. Section 4.2.5, Air Monitoring**

- a. Modify this section to state that air monitoring will also be used for protection of off-site populations.
- b. Include the Table 8.2 from the HASP in this section.

**8. Section 4.3, Waste Disposal**

The proposed disposal facilities are in compliance with EPA's Off-Site Rule and are acceptable to EPA. However, the work plan must indicate where

**9. Section 6.1, Responsibilities and Functions**

Change the organizational chart as indicated below.

**10. Section 6.3, Reporting**

Add Monthly Progress Reports.

**Site-Specific Health and Safety Plan**

- 1. Entire Document**  
Correct the spelling of Shelly Lam throughout the document.
- 2. Section 4.0, Hazard Assessment**  
Excavations should be checked “Yes” since test trenching is part of the scope of work.
- 3. Section 12.2, Additional Emergency Numbers**  
Add the IDEM Spill Line, 888-233-7745.

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